

In the Matter of:

MCDUGLE

vs.

NESHOBA COUNTY, MS, et. al.

MARY HELEN McDOUGLE

July 5, 2016



Court Reporting Solutions

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EXHIBIT "B"

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THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

BRITTNEY McDOUGLE, INDIVIDUALLY, AND
ON BEHALF OF THE HEIRS AND WRONGFUL.
DEATH BENEFICIARIES OF MICHAEL D.
McDOUGLE, SR., DECEASED PLAINTIFF

VERSUS CIVIL ACTION NO:3:15CV350-CWR-FKB

NESHOBA COUNTY, MS, SHERIFF TOMMY WADDELL,
IN HIS INDIVIDUAL AND OFFICIAL CAPACITIES,
CITY OF PHILADELPHIA, MS, CHIEF GRANT MEYERS,
IN HIS INDIVIDUAL AND OFFICIAL CAPACITIES,
AND OFFICERS BRAD CROCKETT, ERIC LOWNDES,
BRAD POE, AND "JOHN DOES 1-6", ALL IN THEIR
INDIVIDUAL AND OFFICIAL CAPACITIES DEFENDANTS

DEPOSITION OF MARY HELEN McDOUGLE

APPEARANCES NOTED HEREIN

DATE: JULY 5, 2016
PLACE: LAW OFFICES OF MIKE WHITE
501 MAIN STREET
PHILADELPHIA, MISSISSIPPI
TIME: 2:30 P.M.

REPORTED BY: DEBORAH H. NELSON
CSR #1256

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9 OTHERS PRESENT:

10 Ms. Brittney McDougale
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1 A No.

2 Q Did he say what he had planned on doing
3 that day?

4 A No, he didn't.

5 Q How long did he stay at your house?

6 A Probably an hour, hour and a half. Me and
7 him always sit around on the porch and talk. You
8 know. We talk about the grandkids. We talk about
9 what we're going to do and this here and that there.
10 So he's always there.

11 Q Do you remember what you talked about that
12 day?

13 A No, I don't.

14 Q Okay. Is that something you would do on a
15 regular basis?

16 A Yes.

17 Q Every day?

18 A Every day.

19 Q Did he have a job at the time that -- uh
20 -- at the time of his death?

21 A He was keeping the kids while Brittney
22 worked, because she didn't want to pay a babysitter.
23 She said that he wasn't working, he could keep the
24 kids. So that's what he did.

25 Q Did you ever keep the kids?